

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

FILED
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U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES OF AMERICA,)

vs.)

CR-03-BE-0530-S)

RICHARD M. SCRUSHY,)

Defendant.)

**GOVERNMENT'S RESPONSE TO MOTION BY BLOOMBERG NEWS,
THE ASSOCIATED PRESS, THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS, THE HEARST CORPORATION, AND THE
BIRMINGHAM NEWS COMPANY FOR LEAVE TO INTERVENE**

The United States of America ("the United States"), by and through Alice H. Martin, United States Attorney for the Northern District of Alabama, respectfully submits that all attorneys for the United States have an affirmative duty to oppose closure of any judicial proceedings because of the vital public interest in open judicial proceedings. See 28 C.F.R. § 50.9. Accordingly, the United States does not oppose the media's motion to intervene.


ALICE H. MARTIN
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2004, a copy of the foregoing was served on the following counsel by facsimile and United States first class mail to:

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